

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|---|---|-------------------------|
| MATTHEW TELLEZ, and |) | |
| JEFFERY TELLEZ |) | |
| |) | |
| <i>Plaintiffs,</i> |) | |
| v. |) | No: 08cv4297 |
| |) | |
| CITY OF BLUE ISLAND, Blue Island |) | |
| Police Officers TIMOTHY SISK, Star 154, |) | District Judge Darrah |
| DAVE STONE, star 167, ALICE PALOMO, |) | |
| Star 259, ANTHONY DELGADILLO, |) | Magistrate Judge Valdez |
| Star 162, and JOHN DOE |) | |
| |) | |
| <i>Defendants.</i> |) | |

**DEFENDANTS' JOINT MOTION TO EXTEND
TIME TO ANSWER OR OTHERWISE PLEAD**

TIMOTHY SISK, DAVE STONE, ALICE PALOMO, ANTHONY DELGADILLO, and the CITY OF BLUE ISLAND, through their attorneys, John Furlan and Neil D. O'Connor of O'Connor & Karnes, and Peter M. Murphy of the City of Blue Island, for their motion to extend time to answer or otherwise plead state:

1. On July 29, 2008, Plaintiffs filed a nine (9) count complaint alleging various claims under 42 USC §1983 and under various state laws.
2. Counsel for the defendants only recently received a copy of the complaint and are making inquiry into the factual allegations contained therein.
3. Counsel for the defendants require additional time to complete their reasonable inquiry in order to properly answer or otherwise plead on behalf of the defendants.
4. Even if the complaints and summonses had been served on the day they were filed (which they were not), the defendants would have until August 18, 2008 to file their answer or to otherwise plead.

5. This motion to extend is filed on August 14, 2008, within the time the defendants' responsive pleadings are due.

6. On August 14, 2008, John Furlan, counsel for the defendants, spoke with Louis J. Meyer, counsel for the plaintiff, who indicated he had no objection to the granting of an extension of time to the defendants to answer or otherwise plead.

WHEREFORE, TIMOTHY SISK, DAVE STONE, ALICE PALOMO, ANTHONY DELGADILLO, and the CITY OF BLUE ISLAND, respectfully request that this Court grant them until September 18, 2008 to answer or otherwise plead, and for any other relief this Court deems appropriate.

Respectfully submitted,

/s/ John Furlan

One of the Attorneys for Defendants,
TIMOTHY SISK, DAVE STONE, ALICE
PALOMO and ANTHONY DELGADILLO

Neil D. O'Connor
John Furlan
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17. N. State St., Suite 1790
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(312) 629-8900

/s/ Peter M. Murphy

One of the Attorneys for the Defendant
CITY OF BLUE ISLAND

Peter M. Murphy
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(708) 396-7031

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| <i>Defendants.</i> |) | |

To: Lawrence V. Jackowiak
Louis J. Meyer
Daniel P. Kiss
Law Offices of Lawrence V. Jackowiak
20 North Clark Street, Suite 1700
Chicago, Illinois 60602

NOTICE OF MOTION

PLEASE TAKE NOTICE that on the 20th day of August, 2008, at 9:00 a.m., I shall appear before the Honorable Judge John W. Darrah in Courtroom 1203 of the Dirksen Federal Building, 219 South Dearborn, Chicago, IL, and then and there present ***Defendants' Joint Motion to Extend Time to Answer or Otherwise Plead***, a copy of which is attached and served upon you.

/s/ John Furlan
One of the Attorneys for Defendants,
TIMOTHY SISK, DAVE STONE, ALICE
PALOMO and ANTHONY DELGADILLO

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/s/ Peter M. Murphy
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CERTIFICATE OF SERVICE

The undersigned, being first duly sworn on oath, states pursuant to Local Rule 12c that copies of documents required to be served by F.R.C.P. 5(a) have been served; that the undersigned served the above and foregoing document upon all persons entitled to notice in this cause on Thursday, August 14, 2008. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/John Furlan